



TENNESSEE DEPARTMENT OF AGRICULTURE
Water Resources Program

October 9, 2013

Mr. Jeremy Cox
Jeremy Cox Farm
P.O. Box 111
Puryear, Tennessee 38251

Mr. Cox,

I recently reviewed an application for Concentrated Animal Feeding Operation (CAFO) permit coverage for your farm. This letter is to inform you that several issues need to be resolved before I can approve your Nutrient Management Plan (NMP) as required to issue your CAFO permit. I have included a detailed list of my comments (please see attached).

Please address each of these comments and make appropriate explanations/corrections or provide the requested additional information. Once I receive your corrected NMP addressing all of the comments, you will have submitted all required elements of a CAFO permit application. Pending approval, a notice will be sent to the Tennessee Department of Environment and Conservation (TDEC) who will then issue the permit.

If you have additional questions regarding permit requirements or how to fulfill them, please feel free to contact me at (615) 837-5492 or Heidi.McIntyre-Wilkinson@tn.gov. Thank you for your cooperation in this permitting process.

Sincerely,

Heidi McIntyre-Wilkinson
Environmental Specialist

Encl: Comments Regarding the Nutrient Management Plan (NMP) Developed for Jeremy Cox Farm

Cc: J.T. Workman
Workman Consulting LLC
(via electronic mail)

Ellington Agricultural Center
P.O. Box 40627
Nashville, TN 37204
Telephone: (615) 837-5492 Fax: 615-837-5025
Email: Heidi.McIntyre-Wilkinson@tn.gov



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Comments Regarding the Nutrient Management Plan (NMP) Developed for Jeremy Cox Farm

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1. The ortho map does not indicate property boundaries (only the boundaries for the fields that will be used in land application). Please indicate all property boundaries (including the production area), and label all animal barns/houses, compost bins, litter storage bins, manure lagoons/holding ponds, nearby roads, fields to which manure/litter will be applied, sinkholes, wells, wetlands, etc.
2. On Page 9, Section 2.3, you provided a table showing the pumpable or spreadable capacity of the lagoon and the annual manure collected. In the field indicating the annual manure collected, does this include only production area manure and flush water, or does this include all inputs into the lagoon (such as precipitation and runoff)? Please provide additional explanation of how the annual manure collected was determined. Also, the Plan is somewhat contradictory with regards to runoff inputs to the lagoon. Page 4, Section 1.2 states that the lagoon is designed to divert water around it; however, Page 8, Section 2.2 describes the lagoon as being designed to temporarily store contaminated runoff. In addition, the figure on Page 9, Section 2.3 show the capacity for the volume of manure, bedding, wash water, flush water, normal runoff, and external storage (if any); however, it indicates no holding capacity is necessary for 25 Yr. 24 Hr. storm event runoff. Please elaborate when/under what conditions the lagoon will receive runoff/contaminated runoff. If estimates were used, please provide the source/citation for the information used in the calculations.
3. Please provide copies of the Phosphorus Index worksheets (i.e. how you arrived at the numbers input into the table on Page 24).
4. Please verify/confirm that you will be adhering to the setbacks provided on Page 26 (i.e. verify that this is an onsite practice, and that the information was not simply included for reference).